

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SYNTEL STERLING BEST SHORES MAURITIUS  
LIMITED, and SYNTEL, INC.,

Plaintiffs and Counterclaim-Defendants,

v.

THE TRIZETTO GROUP, INC.  
and COGNIZANT TECHNOLOGY SOLUTIONS  
CORP.,

Defendants and Counterclaim-Plaintiffs.

1:15-CV-00211 (LGS) (SDA)

Hon. Lorna G. Schofield

**LISTING OF TRIZETTO'S ALLEGED TRADE SECRETS**

TriZetto contends the following 104 items are trade secrets that Syntel Inc. and Syntel Mauritius misappropriated:

1. Facets
2. DDBLD
3. Upgrade Framework
4. Facets Data Dictionary
5. Accounting User Guide
6. Accumulator Batch Import and Export Subsystem Guide
7. Application Support User Guide
8. Audit Archive Guide
9. Authorization Evaluation Criteria
10. Batch Contention Matrix
11. Billing User Guide
12. Capitation/Risk Allocation User Guide
13. CDH Account Management Guide
14. CDH Adapter Administration Guide
15. CDH Adapter Installation and Upgrade Guide
16. CDH Adapter Reference Guide
17. Claims Processing User Guide
18. Claims Reference User Guide
19. Clinical Editing Procedure Listing
20. Clinical Editing Resource Guide
21. Commission User Guide
22. Conversion Guide
23. Customer Service User Guide

24. Data Dictionary Guide
25. Data Models Guide
26. Database Changes (spreadsheet)
27. Database Maps – prior releases
28. DBA Notes (spreadsheet)
29. Dental Claims User Guide
30. Dental Plan User Guide
31. Disability User Guide
32. EDI 270/271 Subsystem Guide
33. EDI 276/277 Version Subsystem Guide
34. EDI 278 Version Subsystem Guide
35. EDI 820 + 820 HIX Subsystem Guide
36. EDI 834 Inbound Version Subsystem Guide
37. EDI 834 Outbound Version Subsystem Guide
38. EDI 835 Version Subsystem Guide
39. EDI 837 Inbound Version Subsystem Guide
40. EDI 837 Outbound Version Subsystem Guide
41. Electronic Claims Guide
42. Extensibility Guide
43. Facets Accumulator Synchronization Guide
44. Facets CES Adapter Guide
45. Facets Change Package Enhancements
46. Facets ClaimCheck Adapter Guide
47. Facets ClaimsXten Adapter Guide
48. Facets Release Notes

49. Facets TCS Integration Guide
50. Facets TriZetto Elements Guide (formerly Facets TMS Guide)
51. Facets/MACESS Interface Guide
52. Getting Started Guide
53. Guided Benefit Configuration User Guide
54. HIPAA Privacy User Guide
55. Installation Guide
56. Integration Services Library (ISL) Developers Guide
57. Letters Guide
58. Medical Plan Models User Guide
59. Medical Plan Reference User Guide
60. Medical Plan Resource User Guide
61. Medical Provider Agreement & Pricing Profile User Guides
62. Medicare Guide
63. Membership Maintenance Subsystem Guide
64. NetworX Broadcasting
65. NetworX Calculation Bean Training
66. NetworX Calculations and Qualifiers
67. NetworX Pricer System Administration
68. NetworX Qualifier Bean Training
69. NetworX System Administration
70. ORM - Archive
71. ORM - Billing
72. ORM - Capitation
73. ORM - CDH

- 74. ORM - Claims
- 75. ORM - Directory
- 76. ORM - Disability
- 77. ORM - EDI
- 78. ORM - HIPAA Privacy
- 79. ORM - Intro
- 80. ORM - Medicare
- 81. ORM - Member
- 82. ORM - Privacy
- 83. ORM - Provider
- 84. ORM - System
- 85. ORM - Tax
- 86. ORM - TriZetto Medicare Solutions
- 87. ORM - Utilization Management
- 88. ORM - Vision
- 89. Provider Batch Import Subsystem Guide
- 90. Provider User Guide
- 91. Reporting Guide
- 92. Services Guides (ISL)
- 93. Subscriber ID Conversion Guide
- 94. Subscriber/Member User Guide
- 95. System Administration User Guide
- 96. System Reference Manual
- 97. TriZetto Upgrade Framework Guide
- 98. Utilization Management Import Subsystem Guide

- 99. Utilization Management Processing User Guide
- 100. Utilization Management Reference User Guide
- 101. Workflow User Guide
- 102. Facets Test Cases
- 103. Facets Automation Scripts
- 104. Facets Custom Code Impact Tool



Dated: October 24, 2020

/s/ Jaren Janghorbani

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